

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Shawn C. Northrup,)	Case No. 3:12-cv-01544-JJH
)	
Plaintiff,)	Judge Jeffrey J. Helmick
)	
vs.)	<u>MOTION FOR EXTENSION OF TIME</u>
)	
City of Toledo, <i>et al.</i> ,)	Adam Loukx, Director of Law
)	(0062158))
Defendants.)	John T. Madigan, Senior Attorney
)	(0023614)
)	City of Toledo, Department of Law
)	One Government Center, Suite 2250
)	Toledo, Ohio 43604-2293
)	Telephone: (419) 245-1020
)	Fax: (419) 245-1090
)	
)	Counsel for Defendants

Now comes the Defendants, and move for an extension of time within which to file a reply to Plaintiff's memorandum in opposition to Defendant's motion for summary judgment until April 14, 2014. Defendants make this motion based the fact that Defendant's counsel was on vacation for part of the week of March 31st and counsel is scheduled to handle a trial in Toledo Municipal Court beginning April 7, 2014.

WHEREFORE, Defendants move for an extension of time until April 14, 2014 to file a reply to Plaintiff's memorandum in opposition to Defendants' motion for summary judgment.

MEMORANDUM

Defendants' counsel received Plaintiff's memorandum in opposition to Defendants' motion for summary judgment on April 3, 2014. At that time Defendants' counsel was out of the office and unable to begin a response to Plaintiff's memorandum. When Defendants' counsel returned to his office he began preparation for a trial in Toledo Municipal Court, *City of Toledo v. Christopher Lawrence, et al.* Toledo Municipal Court Case No. CVG-14-02981, scheduled for hearing on April 7, 2014. While this trial is not expected to last long, Defendants' counsel will need additional time to prepare a reply to Plaintiff's memorandum. Defendants request that they be given until April 14, 2014 to file their reply. Plaintiff's counsel has no objection to this request for an extension of time.

Respectfully submitted,

ADAM W. LOUKX, DIRECTOR OF LAW

/s/ John T. Madigan
John T. Madigan, Senior Attorney
Counsel for Defendant

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing motion for extension of time was sent by regular U.S. mail and electronically to Daniel T. Ellis, Esq., attorney for Plaintiff at: LYDY & MOAN, LTD. 4930 N. Holland-Sylvania Rd, Sylvania, Ohio 43560 this 7th day of April, 2014.

/s/ John T. Madigan
John T. Madigan, Senior Attorney